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Attorneys for Defendant Symrise AG

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: FRAGRANCE DIRECT
PURCHASER ANTITRUST
LITIGATION

Civil Action No. 23-cv-02174 (WJM)
(JSA)

IN RE: FRAGRANCE INDIRECT
PURCHASER ANTITRUST
LITIGATION

Civil Action No. 23-cv-3249 (WJM)
(JSA)

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST
LITIGATION

Civil Action No. 23-cv-16127 (WJM)
(JSA)

**DECLARATION OF
LIZA M. WALSH**

I, Liza M. Walsh, hereby declare as follows:

1. I am an attorney admitted to practice before this Court and partner with

the law firm of Walsh Pizzi O'Reilly Falanga LLP, counsel for Defendant Symrise AG ("Symrise AG"). I am fully familiar with the facts set forth herein.

2. I submit this Declaration in support of Symrise AG's Motion to Dismiss the consolidated complaints filed in (1) *In re Fragrance Direct Purchaser Antitrust Litigation*, Civil Action No. 23-cv-02174 (ECF No. 107); (2) *In re Fragrance Indirect Purchaser Antitrust Litigation*, Civil Action No. 23-cv-3249 (ECF No. 42); and (3) *In re Fragrance End-User Plaintiff Antitrust Litigation*, Civil Action No. 23-cv-16127 (ECF No. 38).

3. Attached as **Exhibit A** is a true and correct copy of the Declaration of Markus Sattler in Support of Defendant Symrise AG's Motion to Dismiss for Lack of Personal Jurisdiction.

I declare that the foregoing statements made by me are true.

Dated: April 8, 2024

s/ Liza M. Walsh
Liza M. Walsh

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: FRAGRANCE DIRECT
PURCHASER ANTITRUST
LITIGATION

Civil Action No. 23-cv-02174 (WJM)
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IN RE: FRAGRANCE INDIRECT
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IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST
LITIGATION

Civil Action No. 23-cv-16127 (WJM)
(JSA)

**DECLARATION OF MARKUS SATTLER IN SUPPORT OF DEFENDANT
SYMRISE AG'S MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION**

I, Markus Sattler, declare and state as follows:

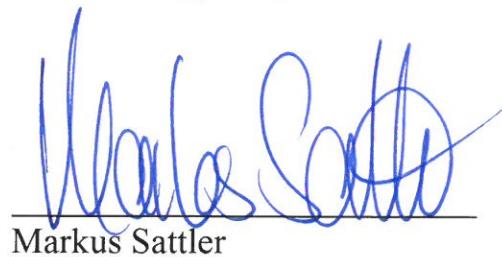
1. I am currently the Group General Counsel for Symrise AG and have held this position since January 1, 2004. The statements in this declaration are based on my personal knowledge and my review of reasonably available documents prepared and/or maintained by Symrise AG in the ordinary course of business. I can competently testify that, to the best of my knowledge and belief, the matters set forth herein are true.
2. This declaration is made in support of Defendant Symrise AG's Motion to Dismiss for Lack of Personal Jurisdiction.
3. Symrise AG is a producer and seller of flavors, fragrances, fragrance ingredients, and raw materials.
4. Symrise AG is a German corporation incorporated under the laws of Germany.
5. Symrise AG's principal place of business is Mühlenfeldstraße 1, 37603 Holzminden, Germany.
6. Symrise AG is not registered or otherwise licensed to do business in the United States.
7. Symrise AG does not maintain any offices or permanent employees in the United States.
8. Symrise AG does not pay taxes in the United States.

9. Symrise AG does not own or lease any real property in the United States nor does it have any other assets in the United States.
10. Symrise AG does not maintain bank accounts in the United States.
11. Symrise AG does not advertise in the United States.
12. Symrise AG has not commenced suit in any court in the United States.
13. Symrise Inc. is an indirectly wholly owned subsidiary of Symrise AG.
14. Symrise AG and Symrise Inc. are separate and distinct corporations, which maintain separate corporate existences.
15. The boards of directors of Symrise AG and Symrise Inc. are composed of separate people and hold separate board meetings.
16. Symrise AG and Symrise Inc. maintain separate financial and accounting books and records.
17. Symrise AG does not finance Symrise Inc.'s day-to-day business operations.
18. Symrise AG and Symrise Inc. undergo separate financial audits.
19. Symrise AG does not control the price for which Symrise Inc. sells its products.
20. Symrise US LLC is an indirectly wholly owned subsidiary of Symrise AG.

21. Symrise US LLC is a holding company and does not engage in any operational activities.

22. Symrise US LLC does not produce, market, or sell any fragrances, fragrance ingredients, or raw materials.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 2, 2024.



The image shows a handwritten signature in blue ink, which appears to read "Markus Sattler". The signature is fluid and cursive, with a horizontal line underneath it.

Markus Sattler